

**HOLLEY, DRIGGS, WALCH, FINE,
PUZEY, STEIN & THOMPSON**
MICHAEL R. AYERS, ESQ.
800 S. Meadows Parkway, Suite 800
Reno, Nevada 89521
Telephone: 775/851-8700
Facsimile: 775/851-7681

Attorneys for Defendant NAVIENT SOLUTIONS, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DAVID WOODRING,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., EQUIFAX INFORMATION SERVICES,
LLC, NAVIENT, and NEW YORK STATE
BOARD OF HIGHER EDUCATION,

Defendants.

Case No. 2:19-cv-00030-JAD-VCF

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR NAVIENT
TO FILE AN ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF’S
COMPLAINT**

(THIRD REQUEST)

Plaintiff DAVID WOODRING (“Plaintiff”) and Defendant NAVIENT SOLUTIONS, LLC, incorrectly named NAVIENT in the Complaint, by and through their respective counsel, stipulate and agree to extend the deadline from the current deadline of March 9, 2019 (ECF No. 19) to March 25, 2019, for Defendant NAVIENT SOLUTIONS, LLC (“NSL”), to File an Answer or Otherwise Respond to Plaintiff’s Complaint (ECF No. 1).

On January 4, 2019, Plaintiff filed his Complaint. The claims at issue necessitate additional time for fact-finding, and the parties have been discussing the documents necessary to determine their respective claims and defenses in order to try and resolve this case. In fact, Plaintiff and NSL have been exchanging documents under a confidentiality agreement in order to try limit the issues and hopefully resolve this matter. NSL just disclosed additional documents on March 7, 2019, but Plaintiff requires additional time to review and digest the information in the documents. Plaintiff has no opposition to NSL’s request for an extension until March 25, 2019 to file an answer or otherwise respond to Plaintiff’s Complaint. Moreover, NSL participated in the 26(f) conference

1 with Plaintiff, and the extension should not impact any of the deadlines in the Stipulated Discovery
2 Plan and Scheduling Order that will soon be filed by the parties.

3 This is the third stipulation for extension of time for NSL to respond to Plaintiff's
4 Complaint and is being made in good faith and not for purposes of undue delay. No additional
5 requests for extensions are contemplated.

6 **IT IS SO STIPULATED.**

7 Dated this 7th day of March, 2019.

8 **HOLLEY, DRIGGS, WALCH, FINE,**
9 **WRAY, PUZEY & THOMPSON**

10 /s/ Michael R. Ayers
11 JAMES W. PUZEY, ESQ.
12 MICHAEL R. AYERS, ESQ.
13 JOHN SAVAGE, ESQ.
14 800 S. Meadows Parkway, Suite 800
Reno, Nevada 89521
Attorneys for Defendant NAVIENT SOLUTIONS, LLC

15 Dated this 7th day of March, 2019.

16 **KNEPPER & CLARK LLC**

17 /s/ Miles Clark
18 MILES CLARK, ESQ.
19 10040 W. Cheyenne Avenue
20 Suite 170-109
Las Vegas, Nevada 89129
Attorneys for Plaintiff

21 **ORDER**

22 The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up
23 to and including March 25, 2019 is so ORDERED AND ADJUDGED.

24 Dated this 8th day of March, 2019.

25 
26 UNITED STATES MAGISTRATE JUDGE
27
28

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of March, 2019, I served a copy of the foregoing
**STIPULATION AND ORDER EXTENDING DEADLINE FOR NAVIENT TO FILE AN
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** upon the party
below via electronic service through the United States District Court for the District of Nevada's
ECF system:

David H. Krieger, Esq.
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123

Jeremy J. Thompson, Esq.
CLARK HILL PLLC
3800 Howard Hughes Parkway
Suite 500
Las Vegas, Nevada 89169

Matthew I. Knepper, Esq.
Miles N. Clark, Esq.
KNEPPER & CLARK LLC
10040 W. Cheyenne Avenue
Suite 170-109
Las Vegas, Nevada 89129

*Attorneys for Equifax Information Services
LLC*

Attorneys for Plaintiff

Jennifer L. Braster, Esq.
Andrew J. Sharples, Esq.
NAYLOR & BRASTER
1050 Indigo Drive, Suite 200
Las Vegas, Nevada 89145

*Attorneys for Experian Information
Solutions, Inc.*

By: /s/ SUSAN M. MATEJKO
An Employee of Holley Driggs Walch Fine, Puzey,
Stein & Thompson